IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA

VENTURIST, INC.,)
Plaintiff)) Case No. 2:06cv00494
v.)
PAT MAUNEY,)
Defendant.))

AMENDED UNOPPOSED MOTION FOR AN EXTENSION TO SERVE INITIAL DISCLOSURES

COMES NOW, Defendant Pat Mauney and submits the following Unopposed Motion for an Extension to Serve Initial Disclosures. The grounds for the motion are as follows:

According to Federal Rules of Civil Procedure, Rule 26(a)(1), initial disclosures must be served within 14 days after the scheduling conference under Rule 26(f). Although the scheduling conference under Rule 26(f) has taken place in this matter, there are three pending motions before the court: Defendant's Motion to Dismiss for Lack of Personal Jurisdiction, Defendant's Motion for Change of Venue, and Plaintiff's Motion for Remand. The parties hereby stipulate to extend the deadline upon which to serve the initial disclosures until 14 days after the Court enters its ruling on the three motions listed above.

Respectfully Submitted,

Dated: September 29, 2006 /S/ - Jennifer D. Barrera

Jennifer D. Barrera

Attorney for Defendant PAT MAUNEY

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CERTIFICATE OF SERVICE

I hereby certify that on September 29, 2006, I electronically filed the foregoing with the Clerk of the Court, using the CM/ECF system which will send notification of such filing to the following registered:

Emily C. Marks BALL, BALL, MATTHEWS & NOVAK, P.A. 2000 Interstate Park Drive, Suite 204 P.O. Drawer 2148 Montgomery, AL 36102

Julie Jordan Martenson, Hasbrouck & Simon 3379 Peachtree Road, N.E., Ste. 400 Atlanta, GA 30326

This 29 day of September, 2006

/S/ - Jennifer D. Barrera
Jennifer D. Barrera